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*Attorneys for Irving H. Picard, Trustee for the
Substantively Consolidated SIPA Liquidation of
Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES, LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Debtor.

**NOTICE OF AGENDA FOR MATTERS SCHEDULED
FOR HEARING ON JULY 28, 2021 AT 10:00 A.M.**

UNCONTESTED MATTERS

1. **10-04610; Picard v. The Whitman Partnership, et al.**
 - A. Trustee's Memorandum of Law in Support of Motion for Summary Judgment filed by Nicholas Cremona on behalf of Irving H. Picard (Filed: 6/11/2021) [ECF No. 104]

- B. Trustee's Statement of Material Facts in Support of Motion for Summary Judgment filed by Nicholas Cremona on behalf of Irving H. Picard (Filed: 6/11/2021) [ECF No. 105]
- C. Declaration of Nicholas J. Cremona in Support of Trustee's Motion for Summary Judgment filed by Nicholas Cremona on behalf of Irving H. Picard (Filed 6/11/2021) [ECF No. 106]
- D. Declaration of Lisa M. Collura, CPA, CFE, CFF filed by Nicholas Cremona on behalf of Irving H. Picard (Filed 6/11/2021) [ECF No. 107]
- E. Declaration of Bruce G. Dubinsky, MST, CPA, CFE, CVA, CFF, CAMS, MAFF filed by Nicholas Cremona on behalf of Irving H. Picard (Filed 6/11/2021) [ECF No. 108]
- F. Declaration of Matthew B. Greenblatt, CPA/CFF, CFE filed by Nicholas Cremona on behalf of Irving H. Picard (Filed 6/11/2021) [ECF No. 109]

Opposition Due: July 21, 2021

Opposition Filed: None

Related Documents:

- G. Notice of Motion for Summary Judgment filed by Nicholas Cremona on behalf of Irving H. Picard (Filed: 6/11/2021) [ECF No. 103]

Status: This matter is going forward.

CONTESTED MATTERS

1. **20-01316; Picard v. Rafael Mayer, et al.**

- A. Defendant Khronos Liquid Opportunities Fund, Ltd.'s Memorandum of Law in Support of its Motion to Dismiss filed by Daniel Stuart Alter on behalf of Khronos Liquid Opportunities Fund Ltd. (Filed: 3/2/2021) [ECF No. 18]
- B. Declaration of Daniel S. Alter filed by Daniel Stuart Alter on behalf of Khronos Liquid Opportunities Fund Ltd. (Filed: 3/2/2021) [ECF No. 19]
- C. Declaration of Rafael Mayer filed by Daniel Stuart Alter on behalf of Khronos Liquid Opportunities Fund Ltd. (Filed: 3/2/2021) [ECF No. 20]

Objections Due: May 4, 2021

Objections Filed:

- D. Trustee's Memorandum of Law in Opposition to Khronos Liquid Opportunities Fund, Ltd.'s Motion to Dismiss filed by Oren Warshavsky on behalf of Irving Picard (Filed: 5/4/2021) [ECF No. 44]
- E. Declaration of Oren J. Warshavsky In Support of the Trustee's Memorandum of Law in Opposition to Khronos Liquid Opportunities Fund, Ltd.'s Motion to Dismiss filed by Oren Warshavsky on behalf of Irving Picard (Filed: 5/4/2021) [ECF No. 45]

Replies Due: June 15, 2021

Replies Filed:

- F. Defendant Khronos Liquid Opportunities Fund, Ltd.'s Reply Memorandum of Law in Support of its Motion to Dismiss filed by Daniel Stuart Alter on behalf of Khronos Liquid Opportunities Fund Ltd. (Filed: 6/15/2021) [ECF No. 49]
- G. Reply Declaration of Rafael Mayer filed by Daniel Stuart Alter on behalf of Khronos Liquid Opportunities Fund Ltd. (Filed: 6/15/2021) [ECF No. 50]

Related Documents:

- H. So Ordered Stipulation and Consent Order signed on 1/22/2021. (Barrett, Chantel) (Entered: 01/22/2021) [ECF No. 5]
- I. Khronos Liquid Opportunities Fund, Ltd.'s Notice of Motion to Dismiss the Complaint Under Bankruptcy Rule 7012(b) and Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6) filed by Daniel Stuart Alter on behalf of Khronos Liquid Opportunities Fund Ltd. (Filed: 3/2/2021) [ECF No. 17]
- J. Stipulation and Order signed on 5/25/2021. (DuBois, Linda) (Entered: 05/25/2021) [ECF No. 48]
- K. Notice of Adjournment of Hearing RE: Motion to Dismiss Party filed by Daniel Stuart Alter on behalf of Khronos Liquid Opportunities Fund Ltd.; Hearing not held and adjourned to 7/28/2021 at 10:00 AM at Videoconference (ZoomGov) (CGM) (Ashmeade, Vanessa). (Entered: 06/16/2021) [ECF No. 54]
- L. Letter to the Honorable Cecelia G. Morris re: July 28, 2021 hearing on Defendants' Motions to Dismiss filed by Oren Warshavsky on behalf of Irving Picard (Filed: 7/21/2021) [ECF No. 64]
- M. Letter Filed by Daniel Stuart Alter on behalf of Khronos Liquid Opportunities Fund LTD (Filed: 7/23/2021) [ECF No. 67]

Status: This matter is going forward.

2. **20-01316; Picard v. Rafael Mayer, et al.**

- A. Rafael Mayer's Memorandum of Law in Support of His Motion to Dismiss the Complaint Under Bankruptcy Rule 7012(b) and Federal Rule of Civil Procedure 12(b)(6) filed by Eric Fisher on behalf of Rafael Mayer (Filed: 3/2/2021) [ECF No. 22]
- B. Declaration of Alexander Potts QC in Support of Individual Defendants' Motions to Dismiss filed by Eric Fisher on behalf of Rafael Mayer (Filed: 3/2/2021) [ECF No. 23]

Objections Due: May 4, 2021

Objections Filed:

- C. Trustee's Memorandum of Law in Opposition to Motions to Dismiss by Rafael Mayer and David Mayer filed by Oren Warshavsky on behalf of Irving Picard (Filed: 5/4/2021) [ECF No. 42]
- D. Declaration of Jason S. Oliver In Support of the Trustee's Memorandum of Law in Opposition to the Motions to Dismiss filed by Defendants Rafael Mayer and David Mayer filed by Oren Warshavsky on behalf of Irving Picard (Filed: 5/4/2021) [ECF No. 43]

Replies Due: June 15, 2021

Replies Filed:

- E. Rafael Mayer's Reply Memorandum of Law in Further Support of His Motion to Dismiss the Complaint filed by Eric Fisher on behalf of Rafael Mayer (Filed: 6/15/2021) [ECF No. 52]

Related Documents:

- F. So Ordered Stipulation and Consent Order signed on 1/22/2021. (Barrett, Chantel) (Entered: 01/22/2021) [ECF No. 5]
- G. Rafael Mayer's Notice of Motion to Dismiss the Complaint Under Bankruptcy Rule 7012(b) and Federal Rule of Civil Procedure 12(b)(6) filed by Eric Fisher on behalf of Rafael Mayer (Filed: 3/2/2021) [ECF No. 21]

- H. Stipulation and Order signed on 5/25/2021. (DuBois, Linda) (Entered: 05/25/2021) [ECF No. 48]
- I. Notice of Adjournment of Hearing RE: Motion to Dismiss Party/Rafael Mayer filed by Eric Fisher on behalf of Rafael Mayer; hearing not held and adjourned to 7/28/2021 at 10:00 AM at Videoconference (ZoomGov) (CGM) (Ashmeade, Vanessa). (Entered: 06/16/2021) [ECF No. 57]
- J. Letter to the Honorable Cecelia G. Morris re: July 28, 2021 hearing on Defendants' Motions to Dismiss filed by Oren Warshavsky on behalf of Irving Picard (Filed: 7/21/2021) [ECF No. 64]
- K. Letter to the Honorable Cecelia G. Morris re: Trustee's July 21, 2021 letter filed by Eric Fisher on behalf of Rafael Mayer (Filed: 7/23/2021) [ECF No. 66]

Status: This matter is going forward.

3. **20-01316; Picard v. Rafael Mayer, et al.**

- A. Defendant David Mayer's Memorandum of Law in Support of Motion to Dismiss the Complaint filed by Matthew M. Graham on behalf of David Mayer (Filed: 3/2/2021) [ECF No. 26]
- B. Declaration of Alexander Potts QC in Support of Individual Defendants' Motions to Dismiss filed by filed by Matthew M. Graham on behalf of David Mayer (Filed: 3/2/2021) [ECF No. 26-1]

Objections Due: May 4, 2021

Objections Filed:

- C. Trustee's Memorandum of Law in Opposition to Motions to Dismiss by Rafael Mayer and David Mayer filed by Oren Warshavsky on behalf of Irving Picard (Filed: 5/4/2021) [ECF No. 42]
- D. Declaration of Jason S. Oliver In Support of the Trustee's Memorandum of Law in Opposition to the Motions to Dismiss filed by Defendants Rafael Mayer and David Mayer filed by Oren Warshavsky on behalf of Irving Picard (Filed: 5/4/2021) [ECF No. 43]

Replies Due: June 15, 2021

Replies Filed:

- E. Defendant David Mayer's Reply Memorandum of Law in Further Support of Motion to Dismiss the Complaint filed by Matthew M. Graham on behalf of David Mayer (Filed: 6/15/2021) [ECF No. 53]

Related Documents:

- F. So Ordered Stipulation and Consent Order signed on 1/22/2021. (Barrett, Chantel) (Entered: 01/22/2021) [ECF No. 5]
- G. David Mayer's Notice of Motion to Dismiss the Complaint Under Bankruptcy Rule 7012(b) and Federal Rule of Civil Procedure 12(b)(6) filed by Matthew M. Graham on behalf of David Mayer (Filed: 3/2/2021) [ECF No. 25]
- H. Stipulation and Order signed on 5/25/2021. (DuBois, Linda) (Entered: 05/25/2021) [ECF No. 48]
- I. Notice of Adjournment of Hearing RE: Motion to Dismiss Adversary Proceeding filed by Matthew M. Graham on behalf of David Mayer; hearing not held and adjourned to 7/28/2021 at 10:00 AM at Videoconference (ZoomGov) (CGM) (Ashmeade, Vanessa). (Entered: 06/16/2021) [ECF No. 55]
- J. Letter to the Honorable Cecelia G. Morris re: July 28, 2021 hearing on Defendants' Motions to Dismiss filed by Oren Warshavsky on behalf of Irving Picard (Filed: 7/21/2021) [ECF No. 64]
- K. Letter to the Honorable Cecelia G. Morris re: Trustee's July 21, 2021 letter filed by Eugene Ernest Stearns on behalf of David Mayer (Filed: 7/23/2021) [ECF No. 69]

Status: This matter is going forward.

4. **20-01316; Picard v. Rafael Mayer, et al.**

- A. Memorandum of Law of Defendants Prince Resources LDC and Prince Capital Partners LLC in Support of Their Motion to Dismiss the Complaint filed by Daniel H. Tabak on behalf of Prince Capital Partners LLC, Prince Resources LDC (Filed: 3/2/2021) [ECF No. 27]

Objections Due: May 4, 2021

Objections Filed:

- B. Trustee's Memorandum of Law in Opposition to Motion to Dismiss by Prince Resources LDC and Prince Capital Partners LLC filed by Oren Warshavsky on behalf of Irving Picard (Filed: 5/4/2021) [ECF No. 41]

Replies Due: June 15, 2021

Replies Filed:

- C. Reply Memorandum of Law of Defendants Prince Resources LDC and Prince Capital Partners LLC in Support of Their Motion to Dismiss the Complaint filed by Daniel H. Tabak on behalf of Prince Capital Partners LLC, Prince Resources LDC (Filed: 6/15/2021) [ECF No. 51]

Related Documents:

- D. So Ordered Stipulation and Consent Order signed on 1/22/2021. (Barrett, Chantel) (Entered: 01/22/2021) [ECF No. 5]
- E. Defendant Prince Resource LDC's and Prince Capital Partners LLC's Notice of Motion to Dismiss the Complaint filed by Daniel H. Tabak on behalf of Prince Capital Partners LLC, Prince Resources LDC (Filed: 3/2/2021) [ECF No. 24]
- F. Stipulation and Order signed on 5/25/2021. (DuBois, Linda) (Entered: 05/25/2021) [ECF No. 48]
- G. Notice of Adjournment of Hearing Re: Motion to Dismiss Adversary Proceeding (Defendants Prince Resources LDC's and Prince Capital Partners LLC'S Notice of Motion to Dismiss The Complaint) filed by Daniel H. Tabak on behalf of PRINCE CAPITAL PARTNERS LLC, PRINCE RESOURCES LDC; hearing not held and adjourned to 7/28/2021 at 10:00 AM at Videoconference (ZoomGov) (CGM) (Ashmeade, Vanessa). (Entered: 06/16/2021) [ECF No. 56]
- H. Letter to the Honorable Cecelia G. Morris re: July 28, 2021 hearing on Defendants' Motions to Dismiss filed by Oren Warshavsky on behalf of Irving Picard (Filed: 7/21/2021) [ECF No. 64]

Status: This matter is going forward.

5. **10-04330; Picard v. Square One Fund Ltd.**

- A. Letter to Chief Judge Morris re: extension of discovery deadlines Filed by David J. Sheehan on behalf of Irving Picard (Filed: 6/14/2021) [ECF No. 215]

Related Documents:

- B. Notice of Hearing to consider the Letter to Chief Judge Morris re: extension of discovery deadlines filed by David J. Sheehan on behalf of Irving Picard, as Trustee for the Liquidation of Bernard L. Madoff Investment Securities LLC filed by Clerk's Office of the U.S. Bankruptcy Court. with hearing to be held on 7/28/2021 at 10:00 AM at Videoconference (ZoomGov) (CGM) (Ashmeade, Vanessa) (Entered: 06/15/2021) [ECF No. 207]
- C. Letter to Chief Judge Morris re: Response to Trustee's Request for Extension of Discovery Deadlines filed by Richard B. Levin on behalf of Square One Fund Ltd. (Filed: 7/7/2021) [ECF No. 218]

Status: This matter is going forward.

6. **10-04330; Picard v. Square One Fund Ltd.**

- A. Motion for the Issuance of Letter of Request related to Albert Collette filed by David J. Sheehan on behalf of Irving Picard (Filed: 6/18/2021) [ECF No. 209]

Objections Due: July 7, 2021

Objections Filed:

- B. Defendant's Memorandum of Law in Opposition to Plaintiff's Motions for Issuance of Letters of Request filed by Richard B. Levin on behalf of Square One Fund Ltd. (Filed: 7/7/2021) [ECF No. 217]

Replies Due: July 14, 2021

Replies Filed:

- C. Trustee's Reply Memorandum of Law in Further Support of His Motions for the Issuance of Letters of Request filed by David J. Sheehan on behalf of Irving Picard (Filed: 7/14/2021) [ECF No. 220]

Related Documents:

- D. Notice of Motion for Order Issuing Letter of Request for the Examination of Albert Collette filed by David J. Sheehan on behalf of Irving Picard (Filed: 6/18/2021) [ECF No. 209-1]

Status: This matter is going forward.

7. **10-04330; Picard v. Square One Fund Ltd.**

- A. Motion for the Issuance of Letter of Request related to Melissa Alessandra Massetta Hariri filed by David J. Sheehan on behalf of Irving Picard (Filed: 6/21/2021) [ECF No. 211]

Objections Due: July 7, 2021

Objections Filed:

- B. Defendant's Memorandum of Law in Opposition to Plaintiff's Motions for Issuance of Letters of Request filed by Richard B. Levin on behalf of Square One Fund Ltd. (Filed: 7/7/2021) [ECF No. 217]

Replies Due: July 14, 2021

Replies Filed:

- C. Trustee's Reply Memorandum of Law in Further Support of His Motions for the Issuance of Letters of Request filed by David J. Sheehan on behalf of Irving Picard (Filed: 7/14/2021) [ECF No. 220]

Related Documents:

- D. Notice of Motion for Order Issuing Letter of Request for the Examination of Melissa Alessandra Massetta Hariri filed by David J. Sheehan on behalf of Irving Picard (Filed: 6/21/2021) [ECF No. 211-1]

Status: This matter is going forward.

8. **10-04330; Picard v. Square One Fund Ltd.**

- A. Motion for the Issuance of Letter of Request related to Luc Deblue filed by David J. Sheehan on behalf of Irving Picard (Filed: 6/25/2021) [ECF No. 213]

Objections Due: July 9, 2021

Objections Filed:

- B. Defendant's Memorandum of Law in Opposition to Plaintiff's Motions for Issuance of Letters of Request filed by Richard B. Levin on behalf of Square One Fund Ltd. (Filed: 7/7/2021) [ECF No. 217]

Replies Due: July 16, 2021

Replies Filed:

- C. Trustee's Reply Memorandum of Law in Further Support of His Motions for the Issuance of Letters of Request filed by David J. Sheehan on behalf of Irving Picard (Filed: 7/14/2021) [ECF No. 220]

Related Documents:

- D. Notice of Motion for Order Issuing Letter of Request for the Examination of Luc Deblue filed by David J. Sheehan on behalf of Irving Picard (Filed: 6/25/2021) [ECF No. 213-1]

Status: This matter is going forward.

E. 10-04330; Picard v. Square One Fund Ltd.

- A. Motion for the Issuance of Letter of Request related to Catherine Lemaitre filed by David J. Sheehan on behalf of Irving Picard (Filed: 7/2/2021) [ECF No. 215]

Objections Due: July 9, 2021

Objections Filed:

- B. Defendant's Memorandum of Law in Opposition to Plaintiff's Motions for Issuance of Letters of Request filed by Richard B. Levin on behalf of Square One Fund Ltd. (Filed: 7/7/2021) [ECF No. 217]

Replies Due: July 16, 2021

Replies Filed:

- C. Trustee's Reply Memorandum of Law in Further Support of His Motions for the Issuance of Letters of Request filed by David J. Sheehan on behalf of Irving Picard (Filed: 7/14/2021) [ECF No. 220]

Related Documents:

- D. Notice of Motion for Order Issuing Letter of Request for the Examination of Catherine Lemaitre filed by David J. Sheehan on behalf of Irving Picard (Filed: 7/2/2021) [ECF No. 215-1]

Status: This matter is going forward.

Dated: July 23, 2021
New York, New York

Respectfully submitted,

/s/ Nicholas J. Cremona

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